

**IN THE UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

IN RE: )  
 ) CASE NO. 16 B 18193  
Anthony Reed, )  
 ) HON. Timothy A. Barnes  
 ) CHAPTER 13  
DEBTOR. )

**NOTICE OF MOTION**

TO: Marilyn O Marshall, 224 South Michigan Ste 800, Chicago, IL 60604, via electronic court notification;

See attached service list.

Please take notice that on June 13, 2019 at 9:30 a.m. I shall appear before the Honorable Timothy A. Barnes in Courtroom 744 of the United States Bankruptcy Court, Everett McKinley Dirksen Building, 219 S. Dearborn Street, Chicago, Illinois 60604 and present the attached motion and you may appear if you so choose.

**PROOF OF SERVICE**

The undersigned, an attorney, certifies that he transmitted a copy of this notice and the attached motion to the above-named creditor and also to the attached service list via regular U.S. Mail with postage prepaid from the mailbox located at 20 S. Clark Street, Chicago, IL 60603 on May 23, 2019.

/s/ Alexander Nohr  
Attorney for Debtors

The Semrad Law Firm, LLC  
20 S. Clark Street, 28<sup>th</sup> Floor  
Chicago, IL 60603  
312-913-0625

Case 16-18193

Northern District of Illinois

Eastern Division

Thu May 23 16:12:05 CDT 2019

219 S Dearborn

7th Floor

Chicago, IL 60604-1702

AMITA Health Adventist Medical Center

Amita Health Bankruptcy

2601 Navistar Dr.

Bldg 3, 2nd Fl

Lisle, IL 60532-3679

ARS

1801 NW 66TH AVE SUITE 200

FORT LAUDERDAL, FL 33313-4571

American InfoSource LP as agent for

Verizon

PO Box 248838

Oklahoma City, OK 73124-8838

CAB SERV

60 BARNEY DR

JOLIET, IL 60435-6402

HERTG ACCTP

1420 S MICHIGAN

SOUTH BEND, IN 46613-2214

Heritage Acceptance Corporation

121 S. Main St.

Elkhart, IN 46516-3123

Illinois Tollway

PO Box 5544

Chicago, IL 60680-5491

MBB

1550 N NORTWEST HWY STE 403

PARK RIDGE, IL 60068-1463

MERCHANTS CREDIT GUIDE

223 W JACKSON BLVD # 700

Chicago, IL 60606-6914

SpeedyRapid Cash

PO Box 780408

Wichita, KS 67278-0408

VERIZON

NATIONAL RECOVERY P.O. BOX 26055

MINNEAPOLIS, MN 55426-0055

VERIZON WIRELESS

PO BOX 4002

Acworth, GA 30101-9003

Anthony Reed  
7836 W 79th Pl Apt 2w  
Bridgeview, IL 60455-1460Marilyn O Marshall  
224 South Michigan Ste 800  
Chicago, IL 60604-2503Nathan E Delman  
The Semrad Law Firm, LLC  
20 South Clark  
28th Floor  
Chicago, IL 60603-1811Patrick S Layng  
Office of the U.S. Trustee, Region 11  
219 S Dearborn St  
Room 873  
Chicago, IL 60604-2027Rodion Leshinsky  
The Semrad Law Firm, LLC  
20 S. Clark Street, 28th Floor  
Chicago, IL 60603-1811

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)Amita Health Bankruptcy Dept

(d)The Illinois Tollway  
PO Box 5544  
Chicago, IL 60680-5491End of Label Matrix  
Mailable recipients 19  
Bypassed recipients 2  
Total 21

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

IN RE: )  
 ) CASE NO. 16 B 18193  
Anthony Reed, )  
 ) HON. Timothy A. Barnes  
 ) CHAPTER 13  
DEBTOR. )

**MOTION TO MODIFY PLAN**

NOW COMES the Debtor, Anthony Reed, by and through Debtor's attorneys, The Semrad Law Firm, LLC hereby moves this Honorable Court to Modify the confirmed Chapter 13 Plan, Debtors state the following:

1. On May 31, 2016, Debtor filed a petition for relief pursuant to Chapter 13 Title 11 U.S.C.
2. On December 15, 2016, this Honorable Court confirmed the Debtor's Chapter 13 Plan.
3. The Chapter 13 Plan allows for secured creditors to be paid 100% of their allowed claims, and general unsecured creditors without priority to be paid 100% of their allowed claims.
4. The Chapter 13 Plan requires the Debtor to make plan payments to the Chapter 13 Trustee in the amount of \$625.00 monthly for 60 months.
5. Debtor works at Ford. During his case, the production plant has gone through numerous shutdowns due to routine maintenance. That in addition, in March and April of 2019, the production plant was shut down for an extended period of time due to re-tooling. As a result, the Debtor accrued a plan payment default that was too large to cure.
6. Debtor can proceed to make payments going forward.

7. Debtor respectfully requests this Honorable Court defer the current plan default to the end of the plan of reorganization.
8. Debtor is in a position to proceed with the instant case.
9. Debtor filed the instant case in good faith and intends to complete the plan of reorganization.

WHEREFORE, the Debtor prays this Honorable Court for the following relief:

- A. That this Honorable Court enter an Order deferring the current plan default to the end of the Chapter 13 Plan of reorganization; and
- B. For such other and further relief as the Court deems fair and proper.

Respectfully submitted,

/s/ Alexander Nohr  
Attorney for Debtors

The Semrad Law Firm, LLC  
20 S. Clark Street, 28<sup>th</sup> Floor  
Chicago, IL 60603  
312-913-0625